



Verizon Communications  
1300 I Street NW, Suite 400W  
Washington, DC 20005

August 29, 2001

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W. – Portals  
Washington, DC 20554

*RE: Application by Verizon New York Inc. for Authorization To Provide In-Region,  
InterLATA Services in State of Pennsylvania, Docket No. 01-138*

Dear Ms. Salas:

This letter responds to staff's request for further information concerning the Line Loss Report that Verizon provides to CLECs when an end user customer changes local carriers.

As Verizon explained in its Reply Comments, Verizon provides a daily Line Loss Report to CLECs and to Verizon's retail operations identifying end user lines that have been migrated to another CLEC or to Verizon. These reports include all of the information specified by the Ordering and Billing Forum guidelines – the working telephone number and the date the end user converted to a new local service provider – as well as additional information identifying the customer type, the billing telephone number, the old local service provider and the new local service provider. Verizon makes the line loss reports available by posting them on an FTP server where the CLECs can download them. Verizon also provides line loss reports to CLECs that request them over Connect:Direct and over EDI. McLean/Wierzbicki/Webster Reply Decl. ¶ 70.

The accuracy of these reports is very high – the percent of working telephone numbers reported as missing or incorrect on the report has averaged less than one percent across the entire former Bell Atlantic footprint for the period of January through June 2001. Even this number overstates the error rate, however. Verizon investigated 1,483 working telephone numbers in Pennsylvania reported on line loss trouble tickets by CLECs. The investigation showed that approximately one third of the lines that the CLECs reported as missing from the report were, in fact, on the report. Another third of the "missing" lines were reported erroneously by the CLECs – in other words, the customer was still the CLEC's customer, the customer had never been the CLEC's customer (and so had not been lost), or the reported working telephone number did not exist. In none of these cases was the Line Loss Report in error. The remaining third contained

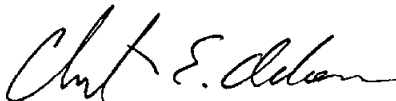
some errors, but also included working telephone numbers that had been disconnected by the CLEC which would not appear on the report and other anomalous conditions. It is clear, therefore, that the Line Loss Report is very accurate. *Id.*

In its Reply Comments, WorldCom argues that a new issue arose with the Line Loss Report in June, which resulted in Verizon not transmitting notifications for a substantial number of lines. WorldCom Reply Comments at 2-3; Lichtenberg Reply Decl. ¶ 4. According to WorldCom, Verizon has failed to provide industry notification of the problem with the Line Loss Report. In addition, WorldCom argues that Verizon must resolve the situation for affected customers. WorldCom Reply Comments at 3-4; Lichtenberg Reply Decl. ¶¶ 10-15. WorldCom is wrong on all scores. While an issue with the Line Loss Report did arise, Verizon notified the industry, has fixed the problem, and has provided corrected files to the CLECs.

WorldCom's issue came to Verizon's attention on July 18, 2001, when it opened a trouble ticket stating that it was receiving only about one-third of the expected line loss notifications. Upon investigation of WorldCom's trouble ticket, Verizon determined that, following a software release that occurred the first weekend in June 2001, the system producing the line loss reports did not recognize the FID (field identifier code) placed on the order by the Verizon business office when an end user changed his or her local service provider from a CLEC to Verizon. As a result, these lines were not included on the line loss reports provided to CLECs. On July 30 and 31, Verizon issued service bulletins to the business offices to instruct them on the correct FID in these situations. Verizon also informed WorldCom that the cause of the problem had been identified and fixed, and that any missing records would be recovered and provided to WorldCom by August 19. Notification was provided to the industry on August 9, 2001. Attachment 1 to this letter is a copy of the Change Management notification to the industry. During the weekend of August 18-19, Verizon completed the recovery for all line losses involving an end user changing his or her local service provider from a CLEC to Verizon from June 2, 2001 through July 31, 2001.

Please let me know if you have any questions. The twenty-page limit does not apply as set forth in DA 01-1486.

Sincerely,

A handwritten signature in cursive script, appearing to read "Clint E. Odom".

Clint E. Odom

Attachment

cc: R. Tanner  
S. Pie



**VERIZON SYSTEM SUPPORT HELP DESK**  
**TYPE 1 SEVERITY 3 BULLETIN**

Severity: 3  
ID#: CR# 2199  
Subject: Line Loss Report

Date & Time of Bulletin: 08/09/01  
Date & Time of Issue Identified: 07/18/01

Report: Final  
Version #: N/A  
Category: Report  
Systems Impacted: N/A  
Area Impacted: Platform and Resale  
Process Affected: Line Loss Report  
Former BA Region: PA, DE, NJ  
Documentation Impacted: N/A

Resolution: The files containing the missing Working Telephone Numbers (WTN) will be made available to the CLECs by August 19, 2001.

Effective Date: 08/19/01

**Details:**

Verizon identified that the Line Loss Reports sent in June and July 2001 have not reported all Working Telephone Number (WTN) losses.